

Attachment A



U. S. Department of Justice

United States Attorney

Eastern District of Washington

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January 16, 2018

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Behind the Gavel (Coordinator)

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Re: United States v. Defendants, et al., 4:15-CR-6049-EFS- Discovery
Disclosure #21




























Dear Counsel:

The following table details **in bold** what is being disclosed as part of this disclosure. If the disclosure contains separate CDs/DVDs, the table below further details the format of the files, some of which further provide instruction on how to open and view the information. The disclosures are detailed as follows:

Discovery Disclosure	Description	Date of Notification
1	Bates Numbered Pages: 00000001-543 Containing pre-indictment pleadings	USAfx 09/20/2016
2	Bates Numbered Pages: 10000002-103 Agency Reports	USAfx 09/23/2016
3	Bates Numbered Pages: 10000104-126; 135-334 Agency Reports	USAfx 10/21/2016
4	Bates Numbered Pages: 00000544-985; 000000982-992; 993-1022; 10000335-889; 930; 939-1027; 20000001-131	USAfx 01/10/2017
5	Bates Numbered Pages: 00001023-1052; 10001028-1263; 30000001-36; CD1_0001-20; CD2_0001-2; CD3_0001-13; CD4_0001-16; CD5_0001-13; CD6_0001- 6;	USAfx 02/16/2017
5	Tracking Data – Provided in the following folders: Phone GPS Tracking Data (Hurtado-8226, Jurado-9166, Casillas-7759, Casillas-2189) BMW 02_25_15-04_04_15 Chrysler Sebring 06_05_15-11_21_15 2002 Accord 07_27_16-09_05_16 Mini Cooper 12_24_14-01_15_15 Mini Cooper Extension 03_27_15-06_15_15 2002 Mini Cooper 10_29_15-02_03_16	USAfx 02/16/2017

	<p>***Please note: These folders hold a substantial amount of data and are provided to you through the USAfx system. They will only be available for you to download through April 15, 2017, before the system discards them. Please download and copy as needed prior to that time.</p>	
5	<p>Telephone Toll Records – Provided in the following folders:</p> <p>DEA Boston</p> <p>DEA Administrative Subpoenas – 1 of 2</p> <p>DEA Administrative Subpoenas – 2 of 2</p> <p>FBI Administrative Subpoenas – 1 of 2</p> <p>FBI Administrative Subpoenas – 2 of 2</p> <p>***Please note: These folders hold a substantial amount of data and are provided to you through the USAfx system. They will only be available for you to download through April 15, 2017, before the system discards them. Please download and copy as needed prior to that time.</p>	<p>USAfx 02/16/2017</p>
5	<p>Bank Records from GJ Returns – Provided in the following folders:</p> <p>Gabriela Vazquez BofA</p> <p>Daisy JP Chase</p> <p>Salvador Gudino Wells Fargo</p> <p>Julio Rosales JP Morgan</p> <p>Brittney Z. Wells Fargo</p> <p>Jennifer Vazquest BofA</p> <p>Jese Wells Fargo</p> <p>Luis De Dios (HAPO)</p> <p>***Please note: These records are personal in nature containing personal identifiers and private information and they are specifically covered under the protective order entered in this case.</p>	<p>USAfx 02/16/2017</p>
5	<p>Audio_Video_Images - Provided in the following folders:</p> <p>UC Audio & Calls 11_23_2015 (T-76)</p> <p>DEA UC Body Wire – LA \$ Drop – Australia 06_29_2016 (N-2)</p>	<p>USAfx 02/16/2017</p>

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	<p>DEA UC Body Wire – LA \$ Drop – Australia 06_29_2016 (N-3)</p> <p>DEA UC Body Wire – LA \$ Drop – Atlanta 11_04_2015 (N-5)</p> <p>DEA UC Phone Calls – LA \$ Drop – Atlanta 11_12_2015 (N-7)</p> <p>DEA UC Body Wire – LA \$ Drop – KC 03_01_2016 (N-8)</p> <p>DEA UC Body Wire – LA \$ Drop – KC 03_11_2016 (N-9)</p> <p>Video and Surveillance Photos – 11_07_2015 (N-130) ... 01_29_2016 (N-132) ... 05_17_2016 (N-139)</p> <p>Surveillance Photos – 01_29_2016 (N-133)</p> <p>***Please note: These folders hold a substantial amount of data and are provided to you through the USAfx system. They will only be available for you to download through April 15, 2017, before the system discards them. Please download and copy as needed prior to that time.</p>																												
6	<p>The items listed below have been downloaded to a hard drive provided by Behind the Gavel and available for pickup at the front desk of the USAO's office</p> <table border="1"> <tbody> <tr> <td> EX-N93 BB-TELL CALLS-TEXT comms wit...</td> <td>3/14/2017 3:35 PM</td> <td>File folder</td> </tr> <tr> <td> LA Transaction 75</td> <td>2/24/2017 2:26 PM</td> <td>File folder</td> </tr> <tr> <td> Money Drop Transactions 66 and 75</td> <td>2/24/2017 2:41 PM</td> <td>File folder</td> </tr> <tr> <td> New York Money Pick Up</td> <td>2/21/2017 11:15 A...</td> <td>File folder</td> </tr> <tr> <td> Phone Download 1B198- Zambrano arrest</td> <td>3/14/2017 3:22 PM</td> <td>File folder</td> </tr> <tr> <td> Pole Camera 8 N. Palouse</td> <td>1/5/2017 3:38 PM</td> <td>File folder</td> </tr> <tr> <td> RCMP Files</td> <td>1/5/2017 12:10 PM</td> <td>File folder</td> </tr> <tr> <td> SAV CASILLAS ET AL Whats up Communi...</td> <td>2/16/2017 7:20 AM</td> <td>File folder</td> </tr> <tr> <td> Traffic Stop Erica Solis</td> <td>3/14/2017 3:01 PM</td> <td>File folder</td> </tr> </tbody> </table>	 EX-N93 BB-TELL CALLS-TEXT comms wit...	3/14/2017 3:35 PM	File folder	 LA Transaction 75	2/24/2017 2:26 PM	File folder	 Money Drop Transactions 66 and 75	2/24/2017 2:41 PM	File folder	 New York Money Pick Up	2/21/2017 11:15 A...	File folder	 Phone Download 1B198- Zambrano arrest	3/14/2017 3:22 PM	File folder	 Pole Camera 8 N. Palouse	1/5/2017 3:38 PM	File folder	 RCMP Files	1/5/2017 12:10 PM	File folder	 SAV CASILLAS ET AL Whats up Communi...	2/16/2017 7:20 AM	File folder	 Traffic Stop Erica Solis	3/14/2017 3:01 PM	File folder	<p>Provided on hard drive and available for pickup at USAO's office.</p>
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7	<p>Bates Numbered Pages:</p> <p>00001053-1258;1259-1648</p> <p>10001395-1595; 1599-1648; 1649-60; 1663-84; 1688-91; 1709-14; 1720-31; 1740-68; 1797-1805; 1814-21</p> <p>CD1_0021-36; CD2_0003-11; CD4_0017-29, CD6_0007-15; CD9_0001-8; 11-26, CD10_0001-5; CD11_0001-15; CD12_0001-14; CD13_0001-2; 3-5; CD14_0001-4</p>	<p>USAfx</p> <p>04/07/2017</p> <p>Expires: 06/06/17</p>																											
7	RCMP Supplemental Disclosure (Crown reports)	USAfx																											

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		04/07/2017 Expires: 06/06/17
7	Landa Jeep Surveillance Photos	USAfx 04/07/2017 Expires: 06/06/17
7	Zambrano Chrysler 300 Tracker Record	USAfx 04/07/2017 Expires: 06/06/17
8	Cell Phone Exam Reports – <u>PLEASE NOTE – SOME OF THESE PHONES CONTAIN GRAPHIC IMAGES – USE APPROPRIATE CAUTION</u> Contains Reports Labeled: 1B198 Apple A1349 Phone, 16 Samsung SM-G360T1, 15 Samsung SM-G360T1, #5 LG VS 990, #1 Samsung SM-S920L, 1B199 Samsung SM-B311V, 1B196 Motorola XT1028, 1B195 Samsung SM-B311V, 1B192 Samsung SM-B311V, 1B182 Samsung SM-B311V, 1B181 Samsung SM-B311V, 6 Samsung SM-G920L	USAfx 04/10/2017 Expires: 06/09/2017
8	Bates Numbered Reports (40000 Series folder): Contains Reports Numbered: 40000036-37, 40000068-71, 40000127-129, 40000132-140, 40000166-169, 40000195-197, 40000223-243, 40000267-269, 40000274-277, 40000280-281, 40000286-292, 40000297-298, 40000303-311, 40000340-344, 40000402-403, 40000428-429, 40000450-452, 40000481-182, 40000508-509, 40000531-533, 40000574-576, 40000615-617, 40000651-652, 40000654-655, 40000657-658, 40000660-661, 40000663-664, 40000666-667, 40000669-670, 40000672-674, 40000677-678, 40000680-682, 40000685-693, 40000697-707, 40000711-717, 40000720-722, 40000725-727, 40000733-755, 40000738-741, 40000744-755, 40000759-762, 40000765-772, 40000775-776, 40000778-783, 40000786-787, 40000789-800	USAfx 04/10/2017 Expires: 06/09/2017
8	PPT Slides (Grand Jury Presentation)	USAfx 04/10/2017 Expires: 06/09/2017
9	Bates Numbered Reports: 00001649-1704; 10001830-1848; 40000808-813	USAfx 05/26/2017 (60 day expiration)
10	Bates Numbered Reports: 00001705-1710; 10001860-2060; 60000001-4	USAfx 06/26/2017
11	Bates Numbered Lab Reports: 60000005-10	USAfx 07/12/2017
12	Bates Numbered Pages (Supplemental Rule 16 Materials) 60000011-221	USAfx 08/07/2017

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13	Supplemental Rule 16 Materials Re Canadian Fingerprint Examination (509 pages-RCMP)	USAfx 08/21/2017
13	Bates Numbered Pages: 00001711-1729; 10002061-2062; 2066; 2068-2078; 60000222; CANINE_0001-1377	USAfx 08/21/2017
14	Bates Numbered Pages: 70000001-360 Side-By-Side Transcription/Translations	USAfx 08/28/2017
15	Bates Numbered Pages: 60000223-224 Additional Lab Reports	USAfx 08/28/2017
16	Bates Numbered Pages: 60000225 Additional Lab Reports	USAfx 09/01/2017
17	Bates Numbered Pages: 70000361-483 Side-By-Side Transcription/Translations	USAfx 09/11/2017
18	Bates Numbered Pages 70000484-648	USAfx 09/28/2017
19	Bates Numbered Pages: 60000226-227; 70000649-777	USAfx 10/12/2017
20	Bates Numbered Pages: 10002081-2108	USAfx 11/17/2017
21	Bates Numbered Pages: 10002109-2112; 40000814-819; 60000228-232; CD4_0030-31; CD6_0048; CD16_0001-3 Also 100002113 (erroneously disclosed as CD6_0007, should have been disclosed under different number series as general discovery)	USAfx 01/16/2018

Please cross-check this letter with the information provided in USAfx and any the actual CDs and DVDs that have been provided. **Please note: USAfx is only a delivery system, it is not a storage receptacle. You are allowed to preview and to download. It is important that you download the discovery as soon as possible, because the link is only available for a certain period of time.** If you are unable to download the discovery or are missing any of the above referenced CDs and/or DVDs, please contact the U.S. Attorney's Office as soon as possible. Likewise, if you have any difficulty with viewing any of the discovery items, please contact the office. If you do not contact this office, we will presume that you have received and were able to view/download all of the above referenced discovery.

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At this time, the United States anticipates additional discovery materials will be provided as they are received and processed by the U.S. Attorney's Office. Additional discovery material is likely to include, but may not be limited to, transcripts, lab reports, fingerprint reports, longitude/latitude data from GPS warrants, law enforcement reports, and other documents (including but not necessarily limited to any Giglio / Henthorn material) that may be relevant to this matter.

Any physical evidence is available for your inspection by contacting Assistant United States Attorney Stephanie Van Marter to arrange a mutually convenient date and time. This discovery is provided under the terms of the Order Regarding Disclosure and Protective Order issued on September 12, 2016 (ECF No. 75).

Very truly yours,

Joseph H. Harrington
United States Attorney

s/Stephanie Van Marter
Stephanie Van Marter
Assistant United States Attorney